

Au, Doreen

From: Morris, Jerry W. <JWMORRIS@GAPAC.com>
Sent: Friday, March 27, 2015 3:16 PM
To: Au, Doreen
Cc: Holzwarth, Dave; Adkins, Thomas R.
Subject: RE: Electronic Data
Attachments: GP Response_VP1116GP_Results_TC23110.xlsx

Hello Doreen,

Please find attached GP's response to your query on the Radco Temperature and additional information on the time gaps you've listed. You are correct that the "true" and "false" indicators do refer to the operation of the Radco oxidizer: "true" means that the control device was operating; "false" means that the control device was not operating. But as you'll see from the information we've provided in the attachment, many of the discrepancies noted in your e-mail can be explained when one examines the downtime of the emission source (the ICI plant) that is controlled by the Radco oxidizer. The "true" and "false" column does not provide that information, and based on a review of our copies of the materials that were provided to you during your on-site visit, it would appear that the ICI plant uptime/downtime information has not been previously provided to you. We have reviewed the ICI plant uptime/downtime data for each of the time periods referenced in your e-mail below, and have provided that information in the attached spreadsheet. In the event that you would like a more complete set of data capturing all periods of ICI plant uptime/downtime for the years in question, please let me know.

If you have any questions or comment, please don't hesitate to call me anytime at (870) 567-7247.

Thank you,

Jerry Morris
GP Chemicals LLC
870-567-7247
jwmorris@gapa.com

From: Morris, Jerry W.
Sent: Tuesday, March 24, 2015 12:34 PM
To: 'Au, Doreen'
Cc: Holzwarth, Dave; Adkins, Thomas R.
Subject: RE: Electronic Data

Hi Doreen,

We are working on your requests and hope to have the information for you soon.

Thank you,

Jerry Morris
GP Chemicals LLC
870-567-7247
jwmorris@gapa.com

From: Au, Doreen [<mailto:Au.Doreen@epa.gov>]
Sent: Tuesday, March 24, 2015 9:55 AM
To: Morris, Jerry W.
Cc: Holzwarth, Dave; Adkins, Thomas R.
Subject: FW: Electronic Data

Sent by an external sender

Good Morning Jerry,

I wanted to provide GP Chemical another opportunity to answer the question from the email below. Just to provide you an example, attached is an initial query on the Radco Temperature is attached.

Incorporating the precision... we compared temperatures against a minimum of 1588F vs. 1600F and did a query using only data where the column contains "True" data.

This provides results where the daily average was less than 1588 and also lets us know how many "true" data points are incorporated. It also lets us know how many time gaps exist in the data.

I then looked at the HON reports submitted during this time frame and the process unit downtown report submitted during the inspection.

Here are just some observations:

For the 1/26/12 data, we will remove the 38 total minutes reported in the SSM report and rerun to determine if the daily average is less than 1588.

For the 2/16/2012 data, there are only 4 hours of "true" data, in the HON report there are no notations for this date, and there are no downtimes noted in the downtime report. It is unclear why there is not additional "true" data points.

For the 2/17/2012 data, there is only 18 hours of "true" data, and only 14 minutes worth of SSM data in the HON report, and no downtimes noted in the downtime report.

Etc..

Please explain what is occurring and please provide a better explanation of the "true" vs "false" column and how that relates to operations, also please provide additional information on the time gaps as many are not included in the process downtime reports and HON reports provided to NEIC.

We need an explanation by March 31st in order to incorporate your explanation in the draft report to EPA Region 6.

Thank you,

Doreen Au
USEPA-NEIC
303-462-9266
Au.doreen@epa.gov

From: Au, Doreen
Sent: Tuesday, March 17, 2015 9:48 AM

To: 'Morris, Jerry W.'

Cc: Holzwarth, Dave

Subject: Electronic Data

Good Morning Jerry,

Our data analysis guy Dave, has had time to review the data provided, and we just want to verify what the column containing True or False means. We believe that True means that the control device was operating, and False means that the control device was not operating. Do we had that right? If you could please check with Maurio, that would be great. -Doreen